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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

TRAWNA NICHOLE MCFADDEN

Debtor

CASE NO: 18-03353-JW

(CHAPTER 13)

**OBJECTION TO PLAN FILED ON  
JULY 16, 2018**

The Chapter 13 Trustee hereby formally objects to the Debtor's plan, filed July 16, 2018, and any other subsequently filed plans which do not meet the standards as indicated below. This objection should be considered to supplement any previously stated and written informal objection. Trustee objects on the grounds that the plan fails to meet the requirements of the code, as follows:

The Plan indicates Debtor's intent to pay her first mortgage payment directly to the creditor through a loan modification, and to pay the two subordinate mortgages directly to those creditors, but Schedule J shows no estimated payment amount and the budget does not evidence an ability to fund any mortgage payment.

Based upon the Schedules filed and the terms of the Plan, the Debtor has not met her burden of proof to show that she "will be able to make all payments under the plan and to comply with the plan" pursuant to 11 U.S.C. §1325(a)(6).

WHEREFORE, the Trustee prays that the Court deny confirmation of the plan.

FURTHER, Trustee asserts that the above has caused delay which could be prejudicial to creditors.

PLEASE TAKE NOTICE that unless the above is timely cured, the Trustee intends to ask for dismissal at Confirmation Hearing. Trustee further requests that if the above issues are cured, but the plan is not confirmable for any other reason, because additional documents, trustee payments, or plan are required, that the court consider dismissal of the case at confirmation hearing, pursuant to 11 U.S.C. §1307(c).

Dated: August 03, 2018

/s/ James M. Wyman

James M. Wyman

Chapter 13 Trustee

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**CERTIFICATE OF SERVICE**

I did this date serve the attached document(s) on the parties listed below by placing the same in the United States mail with proper postage affixed thereto and addressed as follows :

TRAWNA NICHOLE MCFADDEN  
9226 SOUTHERN OAK LANE  
LADSON, SC 29456

DAVID C GAFFNEY  
Gaffney Law Firm, P.A.  
PO BOX 3966  
West Columbia, SC 29171

Dated: August 03, 2018

/s/ Heather Crall

Heather Crall

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